

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*	CASE NO. 11-05769 BKT
MIGUEL ANGEL RODRIGUEZ RODRIGUEZ	*	CHAPTER 13
ERICA PEREZ RODRIGUEZ	*	
DEBTORS	*	
<hr/>		
BANCO POPULAR DE PR as servicing	*	INDEX
Agent of ORIENTAL BANK & TRUST	*	
Movant	*	
MIGUEL ANGEL RODRIGUEZ RODRIGUEZ	*	
ERICA PEREZ RODRIGUEZ	*	
ALEJANDRO OLIVERAS RIVERA	*	
As CHAPTER 13 TRUSTEE	*	
Respondent (s)	*	
<hr/>		

DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM STAY
FILED BY BANCO POPULAR DE PUERTO RICO, DOCKET NO. 66

TO THE HONORABLE COURT:

NOW COME, MIGUEL ANGEL RODRIGUEZ RODRIGUEZ and ERICA PEREZ RODRIGUEZ, debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. Banco Popular de Puerto Rico ("BPPR"), as servicing agent of Oriental Bank & Trust, filed a motion for relief from the automatic stay basically alleging that debtors are in arrears in three (3) post-petition direct payments to said creditor, in the sum of \$2,843.91, including late charges and \$500.00 for costs and legal fees.
2. The debtors hereby respectfully submit that on January 3, 2013, they paid BPPR the sum of \$948.97, to cover the monthly mortgage payment of November, 2012.

Page - 2-
Debtors' Response to §362 Motion
Case no. 11-05769 BKT13

3. The debtors admit that they still owe BPPR the months of December, 2012 and January, 2013.

4. The debtors respectfully submit that on or before February 28, 2013, or within thirty (30) days, they will pay BPPR the stated mortgage loan arrears in order to cure the post-petition arrears.

5. Based on the aforesaid, and upon the curing of the above stated arrears owed to movant, the debtors hereby respectfully request this Honorable Court deny the motion requesting relief from stay filed by BPPR, since there exists no "cause" to lift the stay in the present case.

WHEREFORE, debtors respectfully request from this Honorable Court to deny the motion for relief from stay filed by BPPR in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee Alejandro Oliveras Rivera, Esq.; Vivian Ortiz Ponce, Esq., Cardona Jimenez Law Office, PSC, Counsel for BPPR; I also certify that a copy of this motion has been sent via regular US Postal Service to the debtors/respondents Miguel A Rodriguez and Erica Perez, HC 50 Box 23882 San Lorenzo PR 00754.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 29th day of January, 2013.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR DEBTORS/RESPONDENTS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX NO 787-746-5294
Email: rfigueroa@rfclawpr.com

ORIENTAL GROUP

Cupón Provisional de Pago - Prestamo Hipotecario
Mortgage Loan System Substitute Payment Coupon

00140610100141314116

TIC

Numero de Cuenta / Account Number

Miguel A. Rodriguez

Preparado por / Prepared By
1/3/2013

Fecha / Date

TIC	00140610100141314116	Parces Adicional / Additional Items	Pago Mensual / Monthly Payment
351	11111111	Adicional / Additional	948.97
752	SWT	Recargas Pendientes / Outstanding Charges	Pague esta Cantidad
			948.97
		Total	

Nota: Use un Cupón para cada pago mensual / Note: Use one coupon for each monthly payment.

1/2/2013
PP-8HP

OK
JAN 03 2013
SAN LORENZO
TELLE 001

Pago de \$948.97
1/3/2013